Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of:
Eliminating Regulatory Waste: Harmonizing LPFM and Translator Technical Rules

GN Docket No. 25-133

Comments of the LPFM Advocacy Group (LPFM-AG)

I. Introduction

This filing focuses on one area of wasteful regulatory duplication: the maintenance of two separate sets of technical rules for LPFM and FM translator stations—even though Congress has declared them equal in spectrum priority under the Local Community Radio Act (LCRA). This regulatory divide is inefficient, unfair, and outdated, and it imposes disproportionate burdens on small, nonprofit LPFM broadcasters.

We urge the Commission to eliminate this waste by harmonizing LPFM power limits with those of FM translators—allowing LPFM stations to operate at up to 250 watts ERP, with the same spacing and contour protections applied to translators.

II. Current Technical Rules Are Wasteful and Outdated

The FCC currently caps LPFM power at 100 watts at 30 meters HAAT (or the equivalent), while FM translators—many owned by national chains—can operate at 250 watts under generous interference contours. This creates a double standard, and one that:

- Limits reach and viability for LPFM stations that originate community programming.
- Creates engineering inefficiencies, forcing LPFM stations into less-than-optimal transmitter placements.
- Requires separate rule sets and guidance, wasting staff and applicant resources alike.

This is regulatory waste by design. A single, harmonized rule would conserve FCC staff resources, improve engineering consistency, and align with the LCRA's intent of equality between services.

III. Cost-Benefit and Equity

Maintaining a separate 100-watt cap on LPFM:

- Imposes higher cost per listener on LPFM stations.
- Forces nonprofits to use translators as a workaround, increasing overall system complexity.
- Benefits large translator networks while sidelining local, original programming.

By contrast, adopting a unified technical standard would:

- Increase efficiency, reducing the need for waivers or translator ownership.
- Improve access and equity, especially in rural and underserved communities.
- Support FCC deregulatory goals without introducing new interference risk.

IV. Experience Shows LPFM is Ready

LPFM has matured since its launch in 2000. Licensees now regularly manage compliance, engineering, and community programming at a high standard. The interference fears that justified early power limits have not materialized. In fact, many LPFM operators already operate translators at 250 watts to fill coverage gaps—an inefficient patch caused by the outdated rules themselves.

Allowing LPFM to broadcast natively at 250 watts would reduce the need for auxiliary facilities, improve spectrum efficiency, and give local stations a fair chance to compete with national repeater networks.

V. Proposed Rule Revision

We propose that LPFM stations be authorized to operate up to 250 watts ERP, with the same interference contour protections and engineering rules as FM translators.

This would require a revision of 47 CFR § 73.811, aligning it with the contour-based translator framework. All existing LPFM facilities could be grandfathered, and upgrades would be optional, not mandatory.

VI. Conclusion

Maintaining a separate, lower power cap for LPFM is an inefficient regulatory relic that wastes resources and harms community broadcasters. It contradicts the equal service status mandated by Congress and perpetuates unnecessary duplication in licensing, engineering, and enforcement.

Harmonizing LPFM technical rules with those of FM translators would be a simple, zero-cost reform with significant public benefit. It would reduce regulatory waste, support nonprofit broadcasters, and better serve listeners who rely on local, original programming.

Respectfully submitted,

Dave Solomon
LPFM Advocacy Group (LPFM-AG)
PO Box 25222
Greenville, SC 29616
April 8, 2025